

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

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UNITED STATES OF AMERICA	)	
	)	
	)	
	)	
v.	)	No. 08 CR 5
	)	
PATRICK MCKIBBINS	)	Judge Gettleman
	)	
Defendant.	)	
	)	

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**NOTICE OF MOTION**

To: Bethany Biesenthal  
Assistant United States Attorney  
219 S. Dearborn, 5th Floor  
Chicago, IL 60604

PLEASE TAKE NOTICE that on August 5, 2008 at 9:15 a.m., I shall appear before Judge Gettleman, in Courtroom 1703, and then and there present the Motion to Reconsider Detention Order and Request for Pretrial Release under the Condition of Home Confinement.

Respectfully submitted,

s/ Bart E. Beals  
Bart E. Beals  
Beals Law Firm  
150 N. Michigan Ave  
Suite 2800  
Chicago, IL 60601  
(312) 863-8663

**CERTIFICATE OF SERVICE**

I, Bart E. Beals, an Attorney, certify that on July 29, 2008, I served the Motion to Reconsider Detention Order and Request for Pretrial Release under the Condition of Home Confinement on the below listed party pursuant to Fed.R.Crim.P.49, L.R. 5.5, and the General Order on Electronic Case Filing of the United States District Court for the Northern District of Illinois, Eastern Division.

/s/ Bart E. Beals

Bethany Biesenthal  
Assistant United States Attorney  
219 S. Dearborn, 5th Floor  
Chicago, IL 60604